

REGION 6 EXECUTIVE SUMMARY

TOPIC: CES Environmental Services, Inc., Houston, Harris County, TX

DATE: March 3, 2015

CONTACT: Carl Edlund

PURPOSE/ACTION NEEDED: Site Update

DEADLINE DATE: March 4, 2015

BACKGROUND: The CES Environmental Services (CES) site is a former chemical recycling facility that is located at 4904 Griggs Road, Houston, Harris County, Texas. The Site is surrounded by residential, educational, and commercial properties.

CES filed for bankruptcy in 2010. The Site has experienced significant vandalism which resulted in releases. The most recent incidents were in March and July 2014. The Trustee addressed the spill in March 2014 with Texas Commission on Environmental Quality (TCEQ) oversight. The spill in July 2014 was initially addressed by the City of Houston (COH), then TCEQ with support from EPA.

The EPA began its Removal Assessment activities in late August 2014 and immediately transitioned into a Superfund Removal Action a few weeks later. In addition to the pungent cresolic/phenolic odors emanating from the site, the Site contained wastes within vacuum boxes, roll-off boxes, frac tanks, aboveground storage tanks (plastic and steel), plastic vats, totes, drums, and miscellaneous containers. These wastes are a mixture of acids, bases, hydrocarbons, sulfide bearing waste streams, cresolic/phenolic bearing waste streams, and others. The EPA has been actively and continuously addressing these waste streams since early September 2014. As of February 25, 2015, the EPA has spent over \$1.1 million to address the site wastes.

CURRENT STATUS: (AS OF MARCH 2, 2015)

Materials sent off-site for treatment/disposal (estimated):

- 246,00 gallons hazardous water
- 118,000 gallons oily waters
- 200 cubic yards hazardous sludge
- 30 cubic yards hazardous debris
- 115 cubic yards non-hazardous sands
- 14,200 gallons non-hazardous sludge
- 4,700 gallons hazardous oils

ENVIRONMENTAL/PUBLIC HEALTH CONCERNS:

- The waste is in the process of being re-containerized and disposed. Until this is completed, there is always a potential of a release.
- Off-site drainage has occurred which may have impacted adjacent properties along with the storm water drainage systems.
- Odors have been and continue to be addressed as wastes are removed from the site. Odors will likely continue until the wastes have been removed.

TECHNICAL CONCERNS:

- NONE

REGULATORY/LEGAL REQUIREMENTS:

- NONE

COMMUNITY CONCERNS: This site is surrounded by primarily residential properties. The EPA is working with the following governmental organizations: TCEQ, TDSHS, and COH. The COH agreed to provide use of sanitary sewer for contaminated storm water, potable water for cleaning activities, and periodic air monitoring support.

The TCEQ has agreed to dispose of wastes of up to \$500,000. Additionally, the TCEQ has identified PRPs and is working with the group to complete a Voluntary Cleanup Program (VCP) application. The application and court appearance is expected in the middle to later part of March 2015. The actions anticipated will include an extent of contamination survey and cleanup both on and off-site as necessary.

The EPA has been working Non-Governmental Organizations (NGOs) including Air Alliance Houston, Texas Low Income Housing Information Service, and the Texas Organizing Project. The EPA has held one Public Meeting (December 2014) and was invited to and participated at another meeting (February 2015). The OSC has made himself available to Local Residents, NGOs, News Media, and others.

Based upon EPA conversations with the residents, the following are their concerns:

- **Odors:** The major concerns are the odors that continue to emanate from the wastes located on the site. These odors will continue to some degree until the wastes are completely packaged and disposed. The lingering odors seem to have reduced over the course of the cleanup action;
- **Future Land Use:** The EPA does not control future land use. The City has no zoning.
- **On/Off Site Contamination:** The residents are concerned about the soil contamination on-site and soils which may have travelled off-site into the drainage ditches, and adjacent properties. The EPA is currently addressing the chemicals located on-site. Soil sampling/removal is anticipated to be addressed by PRPs through the TCEQ VCP.

RECOMMENDATIONS/NEXT STEPS: EPA funding is available for the completion of the chemical removal. Beyond the chemical removal, the next phase is anticipated to be done by the PRPs through the TCEQ VCP. EPA will use its enforcement authorities to pursue further cleanup if the site is not addressed by the VCP.



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